REMARKS

Claim 1 is independent and stands rejected under 35 U.S.C. § 102 as being anticipated by Sasaki '358 ("Sasaki"). This rejection is respectfully traversed for the following reasons.

Claim 1 recites in pertinent part, "an internal memory ...; an image processing section for performing the image processing using the internal memory; ... wherein the image processing section includes a plurality of processing circuits each performing predetermined processing as the image processing, and the CPU ***determines whether or not each predetermined processing is performed with use of an external memory***" (emphasis added). According to one aspect of the present invention, it can be made possible for the CPU to switch between processing modes in which only the internal memory is used and/or in which both the internal and external memories are used. It is respectfully submitted that Sasaki is completely silent as to the claimed combination and is indeed unrelated to dual-memory (internal/external) usage in relation to processing of images.

The Examiner relies on line buffers 61a,b or 92a-d of the RPU 23 of Sasaki as the claimed internal memory, and the main memory 29 as the claimed external memory. However, the alleged internal memory of Sasaki is used merely during pixel interpolation, whereas the alleged external memory 29 simply stores the obtained image (i.e., process***ed*** image data; *see* col. 15, lines 35-46 of Sasaki). Accordingly, the alleged external memory 29 is not used in the alleged processing of the image data in Sasaki. It follows that the alleged CPU of Sasaki does not operate to determine "whether or not each predetermined processing is performed with use of an external memory." Indeed, there is no disclosed need or desire in Sasaki for the alleged CPU to do so, as the alleged external memory is simply a conventional *post*-processing storage unit for image data.

As noted above and described in Figures 3-4 of Applicants' drawings and the corresponding written description (*see, e.g.,* S24, S29, S34 in Figure 3, etc.), the present invention can enable dual usage of both the internal and external memories in the processing of the image data.

As anticipation under 35 U.S.C. § 102 requires that each and every element of the claim be disclosed, either expressly or inherently (noting that "inherency may not be established by probabilities or possibilities", *Scaltech Inc. v. Retec/Tetra*, 178 F.3d 1378 (Fed. Cir. 1999)), in a single prior art reference, *Akzo N.V. v. U.S. Int'l Trade Commission*, 808 F.2d 1471 (Fed. Cir. 1986), based on the forgoing, it is submitted that the Sasaki does not anticipate claim 1, nor any claim dependent thereon. The Examiner is directed to MPEP § 2143.03 under the section entitled "All Claim Limitations Must Be Taught or Suggested", which sets forth the applicable standard for establishing obviousness under § 103:

> To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. (citing *In re Royka*, 180 USPQ 580 (CCPA 1974)).

In the instant case, the pending rejection does not "establish *prima facie* obviousness of [the] claimed invention" as recited in the pending claims because the proposed combination fails the "all the claim limitations" standard required under § 103.

Under Federal Circuit guidelines, a dependent claim is nonobvious if the independent claim upon which it depends is allowable because all the limitations of the independent claim are contained in the dependent claims, *Hartness International Inc. v. Simplimatic Engineering Co.*, 819 F.2d at 1100, 1108 (Fed. Cir. 1987). Accordingly, as claim 1 is patentable for the reasons set forth above, it is respectfully submitted that all claims dependent thereon are also patentable.

In addition, it is respectfully submitted that the dependent claims are patentable based on their own merits by adding novel and non-obvious features to the combination.

Based on the foregoing, it is respectfully submitted that all pending claims are patentable over the cited prior art. Accordingly, it is respectfully requested that the rejections under 35 U.S.C. § 102/103 be withdrawn.

CONCLUSION

Having fully responded to all matters raised in the Office Action, Applicants submit that all claims are in condition for allowance, an indication for which is respectfully solicited. If there are any outstanding issues that might be resolved by an interview or an Examiner's amendment, the Examiner is requested to call Applicants' attorney at the telephone number shown below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

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